

UNITED STATES BANKRUPTCY COURT

FILED (1)

EASTERN DISTRICT OF MICHIGAN

2014 AUG 18 P 4:05

SOUTHERN DIVISION

U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT

In re: City of Detroit, Michigan Debtor

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

The following is my motion of objection:

Federal court rulings, state law, a vote of the citizens and the City Charter all agree that the revenue generating enterprise departments of the city are separated agencies. The Detroit Water and Sewerage (DWSD) and Library departments are two such agencies. Each has funds that were specifically and solely dedicated to that department by vote and/or law. Moreover, rulings by the late Judge Feikens and Judge Cox both reinforce same for the DWSD. Several edicts and consent decrees have made that quite clear. Furthermore, judge Cox entered a series of consent decrees and orders to specifically, separate the DWSD from the city of Detroit. The appointed emergency manager (EM) Mr. Orr did not challenge those rulings. In fact, he did not seek to have the DWSD bond holders receive reduced payments as he did the other city bond holders. In fact judge Cox, in his separation orders, stated all funds collected for the DWSD were to remain separate and specifically go to pay for operation, maintenance, employee and retiree wages and benefits. None was challenged by Mr. Orr.

Both enterprise agencies have their own revenue streams by law, rulings and vote. The court did not suspend the law or the vote. In fact, it reinforced same for the DWSD. The DWSD bond holders were not reduced in their payments. Therefore, the employees and especially the retirees can not be as well. They should not be part of these bankruptcy proceedings.

I would like to therefore request:

1.
 - a. The rulings concerning the DWSD made by Judge Cox.
 - b. Specifically those pertaining to separation and benefits of employees and retirees
 - c. EM Orr's statements petitioning the court which lead to the formation of the 'Retirees Committee'
 - d. The negotiation and meeting minutes of Mr. Orr of his rep. with the bondholders for the DWSD.
2. 15-30 minute meeting with judge Cox if I need any clarification on his rulings, specifically dealing with separation, wages and benefits for DWSD, it's employees and retirees

3. To call Ed McNeil, Mike Nicholson, Rob Shinske, Mr. Orr and Judge Cox (if necessary to discuss his specific rulings

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith M. Davis', with a large, stylized flourish at the end.

Keith M. Davis

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E.D. MICHIGAN-DETROIT

IN RE:

CITY of DETROIT

Debtor.

CASE NO: 13-53846
CHAPTER: 9

CERTIFICATE OF SERVICE

I hereby certify that on 8-18-14 (date of mailing), I served

copies as follows:

1. Document(s) served:

MOTION

2. Served upon [name and address of each person served]:

JONES DAY : DAVID NEUMAN

901 LAKESIDE AVE
CLEVELAND, OH 44114

3. By First Class Mail.

Dated: 8-18-14


(Signature)

Print Name: KEITH DAVIS